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REGION VII

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

June 29, 1994

Ms. Diana Newman
U.S. Environmental Protection
Agency, Region VII
726 Minnesota Avenue
Kansas City, KS 66101

Site: Westlake LF
ID #: MO079900932
Break: 10.9
Other: wkpl - Comments
6-29-94

0714

Dear Ms. Newman:

Our office has reviewed the revised draft Work Plan for the Westlake Landfill in Bridgeton, Missouri. Below are our comments on this document:

1. We have a serious concern over the suitability of the existing wells chosen for water quality sampling. At least one of the chosen wells, and perhaps others, was constructed in a manner which renders it inappropriate for the planned water quality monitoring. The plan does not provide a rationale for the wells chosen.
2. Page 3-4, last paragraph: Cambrian should replace Ordovician in the last sentence.
3. Page 3-16, Table 3-2: This table presents some interesting information; in instance, several wells are listed as being completed deeper than the total depth of the borehole they are in. Despite this, the table is very helpful in providing information about the existing wells, particularly the cross reference between the original and current well numbers. However, it does not satisfy the requirement, as stated in the State of Work, of a "critique of all well construction data..." which I consider important when choosing existing wells to use for sampling.
4. Page 5-15, Table 5-4: The units used on the first page of this table are incorrect. Soil units should be ug/kg, and the water units should be ug/l. The units on the second page of this table (i.e. for radionuclides) are correct.
5. Page 6-19, Section 6.3.7: All borings planned at the site, if greater than 10 feet deep, are by definition (RSMo 256.603) monitoring wells. Those abandoned must be plugged according to state regulations as set forth in 10 CSR 23-4.080. Backfilling with soil is not permitted, they must be grouted from the bottom to two feet below the surface.



6. Page 6-21, Section 6.4.2: As mentioned above, backfilling pre-drilled borings at monitoring well locations with soil is not permitted by state regulations.
7. Page 6-30, Section 6.4.6: This section lists which existing wells are to be used for water-quality sampling. It is not clear whether well construction technique was evaluated when choosing these wells. Well construction is an important consideration. The drilling log for Well D-92 indicates that a bentonite based drilling mud was used to drill the borehole for the well and some of the bentonite mud was left in the hole as the well was constructed. The bentonite left behind may be influencing the water quality of samples from that well. The other D-series wells proposed for sampling were constructed during the same phase of investigation, by the same drilling contractor, and presumably by the same technique. I do not consider D-92 to be a well that will yield representative samples of groundwater and there is significant uncertainty with the other D-series wells.
8. Appendix A, Sampling and Analysis Plan: There are two sections number 3.4.8. Also, section 3.4.10 should include decontamination procedures for aquifer testing equipment.
9. Pages 5-15 and 5-16, Table 5-4: Some of the reporting limits in water for specific contaminants are above the PRG for that same contaminant in water. We would like to see documentation of the reasoning behind these reporting limits.
10. Table 7-3A: This table lists cobalt as having a maximum contaminant level of 5 ug/l. What source does this reference? We could not confirm this value with any of the resources available to us.
11. Page 7-39, Section 7.2.4: We have commented before that Missouri's proposed Any-Use Soil Levels rule should be included as a TBC. The response indicated that since the proposed rule had been withdrawn, it should not be a TBC. We do plan on reproposing the rule in the future; therefore, we still contend that it should be considered as a TBC.
12. Page 7-52, last paragraph, first sentence: The word "be" should be deleted from the sentence.
13. Page 9-1, first paragraph, fifth sentence: The word "as" in this sentence should be "at."

FIELD SAMPLING PLAN

14. Page 3-29, second bullet, last sentence: The word "fives" should be "five."
15. Page 4-5, last bullet: The word "be" should be inserted between "will" and "utilized."

Ms. Diana Newman

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Page 3

QUALITY ASSURANCE PROJECT PLAN

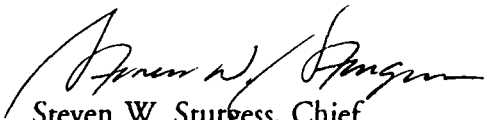
16. Page 7-2, last paragraph, first sentence: The word "of" should be inserted between "consist" and "a."

Thank you for the opportunity to review this document. It is my understanding that a meeting will be held soon to discuss the work plan with the potentially responsible parties for the site. Please contact us once a time/place is firmed up.

If you have any questions or comments, feel free to contact me at (314) 751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM



Steven W. Sturgess, Chief
Project Management Unit
Superfund Section

SWS:bt